

ALEX G. TSE (CABN 152348)  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                           |   |                                       |
|---------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, | ) | CR 15-319 RS                          |
|                           | ) |                                       |
| Plaintiff,                | ) | STIPULATION TO TRANSFER FIREARMS TO   |
|                           | ) | FEDERAL FIREARMS LICENSEE; [PROPOSED] |
| v.                        | ) | ORDER                                 |
|                           | ) |                                       |
| SHAUN W. BRIDGES,         | ) |                                       |
|                           | ) |                                       |
| Defendant.                | ) |                                       |

IT IS HEREBY STIPULATED by and petitioner Deborah Pease-Martinez, both individually and in her capacity as the Settlor and Trustee of the NFA Family Trust (the "Petitioner") and the United States of America (collectively the "parties") to transfer the property described below (the "subject firearms") to a federally licensed firearms dealer:

- a. FNH Scar 17 Rifle (SN# HC24801)
- b. FNH Scar 16 Rifle (SN# LC26320)
- c. Christensen Arms Rifle (SN# CA02181)
- d. Mossberg Shotgun 12GA (SN# AF120609)

1. On or about March 29, 2015, defendant Shaun Bridges sold the subject firearms to Ariana Esposito. See Docket No. 158, Exhibit 2.

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2. On or about March 29, 2015, Ms. Esposito and Deborah Pease-Martinez created a trust in the state of Maryland known as the NFA Family Trust. See Docket No. 158, Exhibit 1.

3. On or about April 1, 2015, defendant Shaun Bridges surrendered physical custody of the subject firearms to the United States. See Docket No. 158 p.2 ¶ 3.

4. Petitioner states and agrees that Deborah Pease-Martinez, as Settlor and Trustee of the NFA Family Trust, is authorized to enter into this Settlement Agreement on behalf of the NFA Family Trust. Petitioner further asserts that the NFA Family Trust is the sole owner of the subject firearms.

5. Petitioner agrees that the FFL or United States may remove the barrel of the Christensen Arms Rifle (SN# CA02181). Petitioner further agrees that the barrel of the Christensen Arms Rifle will be sent to a third-party agreed-upon by the parties.

6. The parties agree that the subject firearms shall be transferred to the following Federal Firearms Licensee (the "FFL"):

2 A Sales & Supplies  
8610 Washington Blvd, Suite 209  
Jessup, MD 20794

7. Petitioner understands and agrees to keep the subject firearms out of the custody or control of any person prohibited from possessing firearms by 18 U.S.C. § 922(g), including but not limited to Shaun Bridges. Petitioner acknowledges that allowing a prohibited person to use, possess, or control the subject firearms would aid and abet a violation of 18 U.S.C. § 922(g), a felony.

IT IS SO STIPULATED:

Dated: 1/10/2018

  
DEBORAH PEASE-MARTINEZ  
Petitioner.

Dated: 1/16/18

  
DAVID B. COUNTRYMAN  
Assistant United States Attorney

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1 [PROPOSED] ORDER

2 UPON CONSIDERATION of the STIPULATION TO TRANSFER FIREARMS TO FEDERAL  
3 FIREARMS LICENSEE, the entire record, and for good cause shown, it is by the Court on this \_\_\_\_\_  
4 day of \_\_\_\_\_, 2018, hereby

5 ORDERED that the United States may remove the barrel of the Christensen Arms Rifle (SN#  
6 CA02181) and transfer the barrel to a third-party agreed-upon by the parties.

7 ORDERED that the (1) FNH Scar 17 Rifle (SN# HC24801); (2) FNH Scar 16 Rifle (SN#  
8 LC26320; (3) Christensen Arms Rifle (SN# CA02181) with the barrel removed; and (3) Mossberg  
9 Shotgun 12GA (SN# AF120609) may be transferred to the following federal firearms licensee:

10 2 A Sales & Supplies  
11 8610 Washington Blvd, Suite 209  
12 Jessup, MD 20794

13 Petitioner is further ORDERED to keep the any of the firearms listed above out of the custody or  
14 control of any person prohibited from possessing firearms by 18 U.S.C. § 922(g), including but not  
15 limited to Shaun Bridges.

16 It is further ORDERED that the instant complaint be dismissed.

17  
18 IT IS SO ORDERED.

19 Dated:

20 HONORABLE RICHARD SEEBORG  
21 United States District Judge  
22  
23  
24  
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26  
27

28 STIPULATION TO TRANSFER FIREARMS AND DISMISS  
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